



MASS **ADVANTAGE**

**CODE OF ETHICS &  
BUSINESS CONDUCT**

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## OUR MISSION, VISION AND VALUES

### OUR MISSION

#### A Statement About Our Organization

Our members are the reasons we are here. Our mission is to make their lives better and easier. At Mass Advantage, we are committed to improving the health and well-being of the diverse communities we serve while delivering the highest level of service and member experience with integrity, respect, and compassion.

### OUR VISION

#### A Statement About Our Future and What We Want To Be

Mass Advantage will provide leadership and innovation designed to provide exceptional value to our members.

### OUR VALUES

#### A Guide To Our Decision-Making As We Move To Our Future

**C**are and treat our members as if they are a beloved member of the family

**A**cting with personal integrity and accountability

**R**especting one another and create opportunities for our employees to be their best

**E**ffecting change through solution-oriented approach and teamwork

**S**upporting our provider partners by developing innovative and sustained relationship

## STANDARDS OF RESPECT

Our Standards of Respect set clear expectations for professional behavior – whether interacting with colleagues, providers or members. They help us be our best selves by removing barriers to communication and creating a collaborative model that puts the member first.

These **six standards** shape how we interact with each other, our members and the communities we serve:

### ACKNOWLEDGE

*NOTICE OTHERS AND RECOGNIZE THEIR CONTRIBUTIONS OR CONCERNS*

### BE RESPONSIVE

*RESPOND IN THE EXPECTED TIME FRAME TO SHOW OTHERS' PRIORITIES ARE IMPORTANT TO YOU, TOO*

### LISTEN

*GIVE YOUR FULL ATTENTION TO SHOW YOU UNDERSTAND AND CARE ABOUT WHAT OTHERS SAY*

### BE A TEAM PLAYER

*DO YOUR WORK IN A WAY THAT ALSO HELPS OTHERS*

### COMMUNICATE

*SHARE APPROPRIATE INFORMATION GENEROUSLY AND AS SOON AS POSSIBLE WITH THOSE WHO NEED IT*

### BE KIND

*CHOOSE TO BE FRIENDLY, PATIENT AND COMPASSIONATE – EVEN WHEN IT'S EASIER NOT TO BE*

## CODE OF BUSINESS CONDUCT

No matter our role or responsibilities, we are all moving together toward the same goal: performing our business activities within ethical and legal standards. The Code ensures that we comply with ethical standards and applicable laws and regulations appropriate to our business. The Code is designed to promote the prevention, detection, and resolution of conduct that does not comply with company policies in addition to state and federal laws and regulations.

Doing your part means that you have the following responsibilities:

- Be familiar with our Mission, Vision, Values and Standards of Respect, and rely on them to guide your actions.
- Follow the information contained in this Code, as well as Mass Advantage policies, laws and regulations that apply to you and your job.
- Ask questions and report concerns.
- Work as a team and treat others with respect.
- Cooperate and be truthful when responding to an investigation, inspection or audit.
- Complete all required training.

## OUR COMPLIANCE PROGRAM

At Mass Advantage we have created a compliance program to support our commitment to ethical practices and to help maintain a culture of integrity that supports our Mission, Vision and Values.

The goals of the compliance program include:

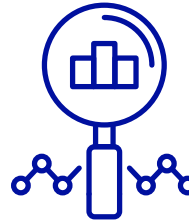
- Establishing and communicating policies to ensure compliance with applicable laws and standards.
- Providing training about standards of ethics, applicable policies and laws.
- Measuring and assessing compliance with legal standards and policies through monitoring and auditing.
- Identifying regulatory-related risks.
- Implementing procedures to prevent, detect and correct breaches of laws, policies and procedures.
- Promoting a culture of integrity.

## MAKING GOOD CHOICES

Making good decisions is not always easy. At times you will be under pressure or may be unsure of what to do. When faced with a difficult decision, ask yourself:



ARE MY ACTIONS CONSISTENT WITH OUR VALUES, THE STANDARDS OF RESPECT, THIS CODE, OUR POLICIES AND THE LAW?



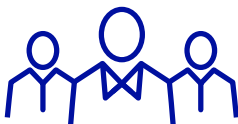
HAVE I CONSIDERED THE CONSEQUENCES AND RISKS INVOLVED WITH MY DECISION?



WOULD I WANT MY ACTIONS REPORTED IN THE NEWS?



HAVE I CONSIDERED OTHER OPTIONS?



WOULD I BE COMFORTABLE DESCRIBING MY DECISION TO MY FAMILY AND FRIENDS?



IF THE ANSWER TO ANY OF THESE QUESTIONS IS "NO," OR IF YOU'RE NOT SURE, STOP AND ASK FOR HELP.

## REPORTING CONCERNS

A culture of integrity and respect is built by each of us every day. It's about doing the right thing – and speaking up when something doesn't feel right. Why speak up? It helps make Mass Advantage the best plan for our members. Your voice always matters, and especially whenever you suspect violations of our Values, the Standards of Respect, this Code or the law. When you report concerns, you are protecting our members, yourself, your coworkers, as well as the reputation of Mass Advantage.

**Remember: An issue cannot be addressed unless it is brought to our organization's attention.**

In most cases, your supervisor should be your first point of contact. They are likely in the best position to understand your concern or question and take the appropriate action. If this isn't practical, or your supervisor is unable to answer your question, or if you have already shared a concern and believe it's not being addressed, or if you would rather share information with someone else – you may report your observations to a director, senior leader or Compliance Officer.

## INVESTIGATIONS AND CONFIDENTIALITY

Any information provided through our confidential reporting system or through any other reporting channel will be treated confidentially to the extent permitted by law, unless doing so prevents Mass Advantage from fully and effectively investigating and responding to the report. If an investigation is needed, it will be conducted by the applicable Mass Advantage function and may also involve other Mass Advantage personnel or external resources. We also may be required by law to report certain types of activities to local, state and/or federal authorities.

## NO RETALIATION

Regardless of the type of alleged or actual wrongdoing reported or the method of reporting, we will not tolerate retaliation against anyone who reports a concern in good faith.

We want everyone to be comfortable sharing concerns and asking questions without worrying about retaliation. We take claims of retaliation seriously; they will be investigated, and if substantiated, retaliators will be disciplined up to and including termination.

If you believe you have been retaliated against, contact any of the resources listed in this Code.

## ACCOUNTABILITY AND DISCIPLINE

Violations of this Code, our policies, laws or regulations can result in serious consequences for you and for Mass Advantage. We investigate reported violations, and if substantiated, violations may result in disciplinary action up to and including termination of employment.

## REGULATORY COMPLIANCE AND ACCREDITING AGENCIES

Mass Advantage is subject to State and Federal laws and regulations. All workforce and contracted service providers must be knowledgeable about and ensure compliance with all applicable laws and regulations. Any violation, suspected violation, situation, or incident believed to constitute a violation must be immediately reported to a supervisor or member of management, the Compliance Officer, or the Compliance Hotline.

Mass Advantage will report the existence of misconduct promptly to the appropriate Government authority within a reasonable period, but not more than 60 days after determining there is credible evidence of a violation.

When reporting misconduct to a Government authority, Mass Advantage will provide all evidence relevant to the alleged violation of applicable Federal or State law(s) and any known potential impact. Once the investigation is completed, the

Compliance Officer will notify the appropriate Governmental authority of the outcome of the investigation, including a description of the impact of the alleged violation. If the investigation ultimately reveals criminal, civil or administrative violations have occurred, the appropriate Federal and State officials will be notified immediately.

Workforce members of Mass Advantage must never conceal, destroy or alter any documents, lie, or make misleading statements to any government investigator at any time, including during an inspection or audit. Workforce members must not attempt to persuade another employee or person to provide false, inaccurate or misleading information or obstruct or delay the communication of information or records relating to the government inspection.

All dealings with accrediting bodies will be conducted in a direct, open and honest manner. As with regulators, workforce members must never conceal, destroy, or alter any documents, lie, or make misleading statements to anyone connected with an accrediting body that would mislead the survey team, either directly or indirectly.

Accrediting bodies may be focused on issues that are both general in nature or more focused on specific items of interest. All standards of an accrediting body from which Mass Advantage obtains accreditation become standards of Mass Advantage and therefore carry the same expectation of compliance as all other requirements.



## **COMPLIANCE WITH REGULATORY REQUIREMENTS**

Mass Advantage workforce members will conduct all business in a professional, ethical manner. Mass Advantage policy requires that all workforce, vendor and contractor comply with both the spirit and the letter of all applicable laws and regulations governing the organization.

## **WORKPLACE CONDUCT AND EMPLOYMENT GUIDELINES**

Mass Advantage is committed to providing a work environment of equal opportunity, in which workforce members are treated with fairness, respect and dignity, in which they are valued for their diversity and provided opportunities for professional development. Mass Advantage prohibits discrimination against individuals in any work-related situation and decisions based on race, color, creed, gender, age, disability status, national origin, religion, marital status, sexual orientation, ancestry, any disability including AIDS, HIV or any other condition. We will make reasonable accommodations for qualified individuals for known physical and mental limitations.

## **HARASSMENT AND WORKPLACE VIOLENCE**

Mass Advantage supports the right of each employee to work in an environment free of harassment, including sexual harassment or abuse of any kind. Harassment is defined as unwelcomed or unsolicited visual, verbal, physical, or other conduct based upon race, color, religion, gender, national origin, ancestry, marital

status, sexual orientation, age, physical or mental ability, disability from AIDS, HIV, or any other medical condition, request for pregnancy leave, family care leave or medical disability leave. This also includes written materials that disparage individuals or groups, intimidation, or other harassing conduct and is not acceptable in the Mass Advantage workplace.

Any form of sexual harassment is prohibited; there is zero tolerance at Mass Advantage for this behavior. This includes unwelcome sexual advances, request for sexual favors or in conjunction with employment decisions and any other visual, verbal or physical conduct of a sexual nature that has the effect of unreasonably interfering with an employee's work or that creates an intimidating, hostile, or offensive work environment.

Harassment includes incidents of workplace violence. This includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism and hate crimes committed by current or former colleagues; possessing firearms, other weapons, explosive devices, or other dangerous materials is not permitted at Mass Advantage worksites. Workforce members who experience or observe any form of harassment or violence are obligated or encouraged to report the incident to their supervisor, Human Resources Department, any member of the management team, the Compliance Officer or the Confidential Compliance Hotline.

## **SUBSTANCE ABUSE-FREE WORKPLACE**

Mass Advantage workforce members are advised that the unlawful manufacture, distribution, dispensation, possession, transfer or use of alcohol or any illegal drug in the workplace, or while engaged in Mass Advantage matters, is strictly prohibited. Associates shall not

be under the influence of illegal drugs or alcohol while at work or while engaged in Mass Advantage matters. Anyone who violates this policy will be subject to disciplinary action up to and including termination of employment.

## **CONFLICTS OF INTEREST**

A Mass Advantage employee's outside activities or personal interests should not influence or appear to influence their ability to make objective decisions in performing their job responsibilities. Workforce members are expected to refrain from engaging in any outside activities that might be in direct conflict with the business interests of Mass Advantage or their responsibilities or duties with Mass Advantage. It may also be considered a conflict of interest if outside activities hinder or distract you from performing your job or cause you to use company resources for purposes other than Mass Advantage purposes. It is the obligation of every employee to ensure they remain free of conflicts of interest in performing their responsibilities for Mass Advantage. It is the responsibility of each workforce member to report any possible conflict of interest to his or her supervisor or the Human Resource Department.

## **RELATIONSHIPS WITH VENDORS AND COLLEAGUES**

No one should feel compelled to give a gift to a colleague for any occasion or to participate in a fund-raising effort. Gifts given or received should be appropriate and in good taste; no one should ever give a lavish gift to a supervisor or manager.

Mass Advantage conducts business and manages vendors in a fair and reasonable manner that is consistent with applicable laws and regulations and within ethical business practices. Vendor selection

is made on an objective basis using criteria such as cost, services, quality, deliverability, technical expertise and ability to supply product timely. All purchasing decisions are based on the vendor's ability to meet the business needs and not on personal relationships.

As an employee of Mass Advantage, you may be exposed to, or directly involved in making or influencing decisions that could affect the health care and services available to our health plan members. As such, you are required to follow Mass Advantage's conflict of interest requirements. Specifically, as a Mass Advantage employee you are prohibited from accepting any gifts, cash bonuses, or other incentives from any organization, individuals or outside entities which could be construed as having influence over the decisions you make through your job duties.

## **SPECIAL CIRCUMSTANCES REGARDING GOVERNMENT EMPLOYEES**

Recruiting and hiring former and/or current federal, state or local government employees is subject to changing rules that vary by rank of employee. Mass Advantage must exercise good judgment and ensure that no conflict-of-interest law is violated when considering such an employee or consultant.

Mass Advantage workforce members must never give gifts or pay for meals, entertainment or reimbursement for travel expenses to a Federal employee or any person acting on behalf of the United States or any organization owned in whole or part by the United States. This includes not offering to pay a fee, salary or compensation of any kind to any government employee.

## COMPANY RESOURCES

Any use of Mass Advantage resources for personal financial gain unrelated to Mass Advantage business is prohibited. Workforce members must protect all Mass Advantage's private and proprietary information. Proprietary information includes "intellectual property" created by workforce members while employed or using Mass Advantage resources. Mass Advantage workforce members have a legal responsibility not only to protect company information, but also to preserve the company's tangible assets, including time, supplies, and equipment. Company assets are to be maintained for business related purposes. As a general rule, the personal use of any Mass Advantage asset without the prior approval of your supervisor is prohibited. On occasion, the use of items, such as copying facilities or telephones, where the cost to Mass Advantage is insignificant, is permissible.

## HEALTH AND SAFETY

Mass Advantage consistently strives to provide a safe and healthy workplace in which all state and federal applicable health and safety laws and regulations are observed. Company policies are to promote the protection of all workforce members and to avoid potential workplace hazards. Workforce members need to be familiar with and understand these policies and how they apply to a specific job responsibility. When in doubt, seek advice from your supervisor whenever you have a question or concern. It is important for all individuals to make others aware of any serious workplace injury or situation presenting a potential danger so the issue can be resolved in a timely manner.

## PROTECTION OF CONFIDENTIAL AND PROPRIETARY INFORMATION

Confidential information about Mass Advantage's strategies and operations is a valuable asset. We will protect the company's confidential and propriety information, as well as nonpublic information entrusted to us by workforce members, plan members, providers and other business partners. We are committed to using and disclosing information only for its intended purposes. Confidential information and propriety information will be accessed, used or disclosed by workforce members only as needed to perform specific job responsibilities.

Confidential information includes, but is not limited to, personnel records and wage information, medical and insurance information, pricing and cost data, affiliations, contracts and rates, financial data, research data, strategic plans, marketing strategies, techniques, employee lists and data maintained by the organization, supplier and subcontractor information, and proprietary computer software. Workforce members' computer logins and passwords are not to be shared with anyone. Each of us must respect the confidential nature of this information, as we would expect our own personal information to be respected.

## PATIENT INFORMATION AND PATIENT RIGHTS

Mass Advantage complies with the Health Insurance Portability and Accountability Act (HIPAA) specifically regarding Protected Health Information (PHI) and undertakes activities to assure that each workforce member is knowledgeable about and complies with Mass Advantage's Privacy Policies. Mass Advantage recognizes the sensitive nature of patient information and is committed to

maintaining its confidentiality. Mass Advantage respects our members' rights to confidential treatment and privacy of all communications and records pertaining to their care. Written permission shall be obtained before the medical records can be made available to anyone not directly concerned with the care, except as permitted by law or as necessary in the administration of Mass Advantage. All members are treated with respect and dignity and are provided care that is based on patient needs and delivered within appropriate standards of medical practice.

Workforce members are required to notify their manager in the event of a breach of protected health information or unencrypted sharing of personal information, in accordance with State and Federal regulations and Mass Advantage policy.

## **RECORD RETENTION AND ACCURACY**

Mass Advantage workforce members must ensure documents and records are accurate and comply with regulatory and legal requirements. Records shall not be altered or falsified and shall accurately and fairly reflect the company's financial information, transactions, and assets. All financial records shall conform to generally accepted accounting principles (GAAP). All medical and business documents and records shall be stored and retained in accordance with the law and Mass Advantage policies. These documents include letters and memos in paper format, computer-based information including, electronic mail, computer files on disk or tape, and any other medium that contains information about the organization or its business activities. Documents and records shall be retained and destroyed appropriately in accordance with both company policy and regulatory requirements.

## **MARKETING AND BUSINESS PRACTICES**

Mass Advantage and its representatives shall conduct all marketing, pricing and sales activities with honesty, fairness, and integrity in a straightforward manner and with non-deceptive information being disseminated. Mass Advantage presents all information in a concise, unbiased, and accurate manner and all material is reviewed and approved by the appropriate State agency as required prior to distribution.

## **CONTRACTING**

All Mass Advantage business transactions must be conducted in an honest manner and with integrity. In the negotiation of a contract all workforce must verify the accuracy, completeness and currency of all data generated and given out within the process, including the use of all appropriate regulatory language that may be required. Workforce members must not make false statements, misrepresentations or engage in fraudulent activities with members, providers, vendors or any other third party.

Mass Advantage shall maintain confidentiality regarding contract pricing and information and no confidential information will be disclosed to third parties unless required by law.

## **MARKETING AND ADVERTISING**

Mass Advantage uses marketing and advertising to inform and educate the communities in which it is licensed regarding the availability and value of its products and to increase awareness of its services, and to recruit workforce members, when necessary. Mass Advantage will present only honest, fully informative, and

non-deceptive information in these materials, publications, and notices.

## **COMPETITOR INFORMATION**

Mass Advantage obtains information about other companies, including competitors through legal and ethical means such as public documents, printed and verbal presentations and published articles in various media. Mass Advantage competes creatively and honestly in its day-to-day business activities so as to not compromise its ethical standards or create a conflict of interest. It is not acceptable to acquire confidential information regarding a competitor through illegal means, including requiring anyone to breach a contractual agreement. Workforce members are discouraged from serving as a director on a board of a competing company that could directly or indirectly create a conflict of interest. This also includes working part-time or as a consultant.

## **ANTITRUST**

Antitrust laws promote fair competition and by discussing Mass Advantage business such as pricing, specific contracting arrangements or allocation of market segments in public with competitors could be in violation of these laws. These situations could arise at business meeting, educational opportunities, seminars and trade association meetings. Workforce members shall exercise caution when participating in discussions of a sensitive nature. Any questions about antitrust activities may be brought to your supervisor or the Compliance Office.

## **BUSINESS COURTESIES OR INDUCEMENTS**

Any marketing or business activities that involve giving anything of value to a member, provider, or any non-workforce member must be within all regulatory guidelines and company policy. Federal and state laws prohibits Mass Advantage and its workforce members from offering anything of value to an entity or person in order to induce that person to purchase services from or to refer a customer to Mass Advantage. It is critical to avoid the appearance of impropriety when giving gifts to individuals who do business or are seeking to do business with Mass Advantage. The company may sponsor an event as long as the purpose is not to induce any favorable business action or to improperly influence relationships or business outcomes.

The Federal and state government have strict rules and laws concerning gifts, meals, and other business courtesies for their workforce. Mass Advantage is to not provide any gifts, entertainment, meals, or anything else of value to any employee of the Federal or state government, except in the way of insignificant refreshments in conjunction with business discussions.

## **POLITICAL ACTIVITIES**

It is imperative to separate one's personal and corporate political activities so Mass Advantage can comply with all the appropriate rules and regulations relating to lobbying or endeavoring to influence government officials. Workforce members may participate in the political process on their own time and at their own expense. It is important not to give the impression that you are speaking on behalf of or representing Mass Advantage while participating in these activities. Workforce members will not be

reimbursed by Mass Advantage for any personal contributions for any such political purposes. State and Federal laws, along with company policy, prohibit the use of funds, assets, services or facilities on behalf of a federal, state or local political party or candidate except under certain limited circumstances. To find out about these limited circumstances, seek guidance from the Human Resources Department.

## **WHERE TO FIND ANSWERS TO ADDITIONAL QUESTIONS**

The Code of Business Conduct is meant to provide an overview of Mass Advantage policies on ethics, compliance and conduct-related issues. This publication is a living document and is subject to change as we refine our policies and procedures and as government agencies and regulators modify their rules.

In addition to using this publication, workforce should familiarize themselves with the relevant policies and procedures posted on the Mass Advantage intranet site. This site contains extensive information on Mass Advantage's policies related to employment, workplace conduct, confidentiality, security and other important topics.

For additional information, or to report a concern, you may contact Mass Advantage's Compliance Hotline at 1-xxx-xxx-xxxx.